

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

x

LYDIA GARCIA, Individually and On Behalf	:	Civil Action No. 04-CV-8807
of All Others Similarly Situated,	:	
Plaintiff,	:	<u>CLASS ACTION</u>
vs.	:	
JAKKS PACIFIC, INC., et al.,	:	
Defendants.	:	
QUANTUM EQUITIES LLC, Individually and	:	Civil Action No. 04-CV-8877
On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	<u>CLASS ACTION</u>
vs.	:	
JAKKS PACIFIC, INC., et al.,	:	
Defendants.	:	

---

[Caption continued on following page.]

NOTICE OF WITHDRAWAL WITHOUT PREJUDICE OF INDIANA ELECTRICAL  
WORKERS' MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND APPROVAL OF SELECTION OF LEAD COUNSEL

---

JAMES T. KAHN, On Behalf of Himself and : Civil Action No. 04-CV-8910  
All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
:

JAKKS PACIFIC, INC., et al., :  
Defendants. :  
:

---

JONCO INVESTORS, LLC, Individually and : Civil Action No. 04-CV-9021  
On Behalf of All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
:

JAKKS PACIFIC, INC., et al., :  
Defendants. :  
:

---

JAMES IRVINE, Individually and On Behalf : Civil Action No. 04-CV-9078  
of All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
:

JAKKS PACIFIC, INC., et al., :  
Defendants. :  
:

---

x

Institutional Investor Indiana Electrical Workers Pension Trust Fund IBEW ("Indiana Electrical Workers") hereby withdraws its motion for consolidation, appointment as Lead Plaintiff and approval of its selection of Lead Counsel in light of the Court's Order of January 4, 2005. This withdrawal is made without prejudice to Indiana Electrical Workers' right to refile its motion, consistent with the Order and subsequent proceedings.

DATED: January 11, 2005

LERACH COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
SAMUEL H. RUDMAN (SR-7957)  
DAVID A. ROSENFELD (DR-7564)  
MARIO ALBA JR. (MA-7240)

---

/s/ Mario Alba Jr.

MARIO ALBA JR.

200 Broadhollow Road, Suite 406  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiffs

I:\Jakks\LP Motion\LP Notice of Withdrawal.doc